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**National Emergency  
Number Association**



110 South Sixth Street/P.O. Box 1190  
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1-800-332-3911

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

*Doc. 92-105*

William E. Stanton  
Executive Director

September 7, 1993

Peyton L. Wynns  
1250 23d Street, Room 100  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Wynns:

The National Emergency Number Association (NENA) is a 501 C-3 non-profit organization involved in the Proliferation of Enhanced 9-1-1 throughout the United States and Canada. Our membership is made up of those involved in public safety, i.e.: Emergency Center Managers and Administrators; City, County, State, Emergency Boardmembers; Regulated Telephone Companies and vendors of emergency services.

The NENA Executive Board in June of 1993 voted to oppose the utilization of N-1-1 service codes. The basic reason for this position is stated in the following short, concise statements:

- \*It will cause confusion and misdials from a user under extreme stress.
- \*It could delay an emergency call in a situation where "Seconds Count."
- \* It will create unnecessary and dangerous hang-up calls that must be responded to, by premises visits by Law Enforcement.
- \*It will take, "Line Time" away from legitimate emergency calls.
- \* 9-1-1 will lose it's "Uniqueness As The Emergency Number."
- \*It is not in the best interest of the public.

The majority of our members are the personnel who manage and man these centers. They are the people who undergo extreme stress every day in just doing their job of handling real emergencies. So, please understand they have no profit-oriented axe to grind here. Their primary concern is to assist those in need as quickly and completely as possible.

I am enclosing some additional information. Please take the time to read this. It is typical of the concerns our people have in the Emergency Centers of this country.

NENA certainly isn't opposed to allowing abbreviated dialing for commercial use. However, we are unalterably opposed to the utilization of the service codes to that end.

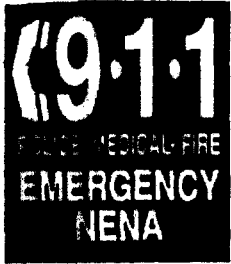
Thank you for taking time to consider this letter and it's contents. Should you have any questions, I can be reached at 1-800-332-3911.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Stanton".

Bill Stanton  
Executive Director  
NENA

WES/gw



NATIONAL  
EMERGENCY  
NUMBER  
ASSOCIATION



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North Carolina Chapter

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ROY D. MEREDITH, PRESIDENT & NEWSLETTER EDITOR

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P.O. Box 429, HIGH POINT, NC 27261-0429 / PHONE 919-885-2899 / FAX 919-883-3419

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July 23, 1993

William E. Stanton  
Executive Director  
National NENA Office  
110 South 6th Street  
P.O. Box 1190  
Coshocton, OH 43812-6190

Dear Bill,

On behalf of the membership of the *N.C. Chapter of NENA*, which is over 400 members strong, I would like to request the assistance of the *National NENA Office* concerning several matters which are of great importance to our members.

We would like to request that the *National NENA Office* pursue a satisfactory resolution of these matters before the Federal Communications Commission (FCC).

N-1-1 SERVICE CODES:

Our members are quite concerned about the assignment of "N-1-1" service codes for commercial uses, such as has been done in the State of Florida where their Public Service Commission recently authorized Bell South to assign "5-1-1" to a Palm Beach newspaper for information services.

The proliferation of the use of "N-1-1" service codes for commercial uses will quickly compromise the uniqueness of the "9-1-1" emergency telephone number, which will result in a great deal of confusion on the part of the general public, and could very easily cost someone their life because of a simple misdial.

Someone trying to dial "9-1-1" during an emergency, might easily misdial "8-1-1" by mistake, and reach a radio talk show, for example, instead of reaching the Emergency Services agencies which they so desperately need.

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In such a scenario, if "8-1-1" had not been assigned for commercial use by a radio talk show, the person experiencing an emergency would have received a recorded messaging informing them that they had misdialed. Then, they could quickly redial the correct emergency telephone number "9-1-1" and receive the emergency assistance they so desperately needed, instead of experiencing a costly, and possibly deadly delay by being connected to a radio talk show.

Another problem which the commercial use of "N-1-1" service codes will cause is misdials to "9-1-1" by people who intended to dial the 3-digit telephone number of a commercial service. It is the policy of most Emergency Services Communications Centers to dispatch police officers (and sometimes firefighters and paramedics) to all "9-1-1" calls, including those where the callers say that they simply misdialed the telephone number they were trying to dial.

This type of "9-1-1" response policy has saved countless lives, and prevented numerous injuries and loss of property, in situations where the callers were unable to remain on the telephone to talk to the Dispatchers, and in situations where someone other than the caller (such as a burglar, robber, or rapist) was forcing the caller to tell the Dispatchers that he/she had misdialed "9-1-1."

The commercial use of "N-1-1" service codes will undoubtedly cause a large scale increase in the quantity of misdials to the "9-1-1" emergency telephone number systems throughout the United States, and will result in the unnecessary and costly dispatch of emergency services personnel to check out each of those misdialed calls. Each such unnecessary dispatch of emergency services personnel will carry with it the risk of additional injuries and/or deaths due to the fact that such responses are often accomplished by field personnel using the lights and sirens on their emergency vehicles, while traveling above the posted speed limit, thereby increasing the chances of them becoming involved in traffic accidents.

The commercial use of "N-1-1" service codes will cause a lot of very costly, and possibly deadly, problems for the public when they misdial another 3-digit telephone number while attempting to dial the "9-1-1" emergency services telephone number, as well as causing a lot of equally costly, and possibly deadly, problems for our emergency services personnel when they respond unnecessarily on calls to the "9-1-1" emergency services telephone number by people who misdialed it while trying to dial another 3-digit telephone number.

The members of the N.C. Chapter of NENA would like to go on record as being strongly opposed to the commercial use of "N-1-1" service code numbers.

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#### CELLULAR TELEPHONES:

Another issue which the members of the *N.C. Chapter of NENA* are very concerned about, and have been for a number of years, is the fact that "9-1-1" calls from cellular telephone users do not provide any of the information that Enhanced 9-1-1 (E9-1-1) systems are capable of providing.

Calls to an E9-1-1 system from a traditional telephone will display an Automatic Number Identification (ANI), and an Automatic Location Identification (ALI). The ANI provides a computerized display in the Emergency Services Communications Center of the caller's telephone number, and the ALI provides a computerized display of the address where that telephone is physically located.

While it is generally impossible for cellular telephone calls to provide an ALI display, due to the fact that most cellular telephones are used in a mobile environment, the technology is available to provide an ANI display for cellular telephone calls to E9-1-1 systems.

The ANI display is of vital importance to the Dispatchers who work in our E9-1-1 Emergency Communications Centers, as it provides them with a telephone number of the caller in case they need to call them back to obtain additional information about an emergency call.

Since the technology is available to provide an ANI display for every cellular telephone call to our E9-1-1 systems, the members of the *N.C. Chapter of NENA* would like to see ANI displays implemented by the providers of cellular telephone service.

A requirement that providers of cellular telephone service pass along an ANI display for every E9-1-1 call which is placed by a cellular telephone user would greatly improve the ability of our E9-1-1 Dispatchers to provide better emergency services to our citizens. As the use of cellular telephones increases by leaps and bounds throughout the United States, this is becoming an increasingly important issue for our E9-1-1 Emergency Communications Centers.

#### PCN/PCS TELEPHONES:

Another issue which is looming on the horizon, and which is very similar to those mentioned above regarding cellular telephone calls to E9-1-1 Emergency Communications Centers, is that of Personal Communications Networks/Personal Communications Systems (PCN/PCS) telephones.

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As PCN/PCS systems are being developed, it would be the perfect time to address the issue of the need for those systems to pass along an ANI display on all E9-1-1 calls which are placed from PCN/PCS telephones.

The need for that information is the same as for cellular telephone E9-1-1 calls, and the technology is also available for that information to be provided.

When you travel to Washington, D.C. in the near future to meet with representatives of the FCC, the members of the *N.C. Chapter of NENA*, which is over 400 members strong, would like to go on record as being strongly opposed to the commercial use of "N-1-1" service codes, and as being strongly in favor of the development of rules which would require that both cellular telephone service providers and PCN/PCS telephone service providers pass along the ANI information for all E9-1-1 calls from such telephones.

Thank you very much for your assistance with these most important matters.

Cordially,



Roy D. Meredith,  
N.C. Chapter President

PS: I have enclosed a copy of a letter, dated February 12, 1993, from one of our members, Nick Waters, which states his strong opposition to the commercial use of "N-1-1" service codes.

[Note: Mr. Stanton's letter did not include letter from Mr. Waters.]